

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS

FAIRCHILD SEMICONDUCTOR
CORPORATION, a Delaware corporation,
INTERSIL AMERICAS, INC., a Delaware
corporation and INTERSIL CORPORATION,
a Delaware corporation

Plaintiff,

v.

POWER INTEGRATIONS, INC., a Delaware
corporation,

Defendants.

JURY

CIVIL ACTION NO. 2:06-cv-151

PLAINTIFFS' AMENDED COMPLAINT

Plaintiffs FAIRCHILD SEMICONDUCTOR CORPORATION (hereinafter, "Fairchild"),
INTERSIL AMERICAS, INC. and INTERSIL CORPORATION, (Intersil Americas, Inc. and
Intersil Corp. are collectively "Intersil") by and through their undersigned counsel, hereby
alleges as follows:

THE PARTIES

1. Fairchild Semiconductor Corporation is a Delaware corporation with its principal
place of business in South Portland, Maine.

2. Intersil Corporation is a Delaware corporation with its principal place of business
in Milpitas, California.

3. Intersil Americas, Inc. is a Delaware corporation with its principal place of
business in Milpitas, California.

4. Power Integrations, Inc. is a Delaware is a Delaware corporation with its principal
place of business in San Jose, California.

JURISDICTION AND VENUE

5. This is an action arising under the patent laws of the United States, Title 35 of the United States Code. This court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

6. Upon information and belief, this Court has personal jurisdiction over the defendant because Power Integrations sells the accused devices within this district.

7. Upon information and belief, venue is proper in the Court pursuant to 28 U.S.C. § 1391(b) and (c) and § 1400 as the defendant is subject to personal jurisdiction in this district.

FIRST CAUSE OF ACTION

INFRINGEMENT OF U.S. PATENT NO. 5,264,719

8. The allegations of paragraphs 1-7 are incorporated as though fully set forth herein.

9. U.S. Patent No. 5,264,719 (the “‘719 Patent”), entitled *High Voltage Lateral Semiconductor Device*, duly and lawfully issued on November 23, 1993 and was assigned to Harris Corporation. A true and correct copy of the ‘719 Patent is attached hereto as Exhibit A.

10. Upon information and belief, on or about September 27, 1999 the ‘719 Patent was assigned by Harris Corporation to Intersil Corporation. A true and correct copy of that assignment is attached as Exhibit B.

11. Upon information and belief, on or about April 14, 2006, Intersil Corporation changed its name to Intersil Communications, Inc. A true and correct copy of the restated certificate of incorporation is attached as Exhibit C.

12. Upon information and belief, on or about April 14, 2006 the ‘719 Patent was assigned by Intersil Communications, Inc. to Intersil Americas, Inc. A true and correct copy of that assignment is attached as Exhibit D.

13. On or about March 30, 2006, Fairchild Semiconductor Corporation and Intersil Corporation entered into a Patent License Agreement that gave Fairchild the right to assert the

'719 Patent against Power Integrations. A redacted copy of that Patent License Agreement is attached as Exhibit E.

14. On or about May 17, 2006, Fairchild Semiconductor Corporation, Intersil Corporation, and Intersil Americas, Inc. entered into a Supplemental Agreement effective March 30, 2006 that gave Fairchild the right to assert the '719 Patent against Power Integrations. A true and correct copy of that Supplemental Agreement is attached as Exhibit F.

15. Upon information and belief, Power Integrations has been and is now infringing the '719 Patent, both literally and under the doctrine of equivalents, by making, using, selling, offering for sale, and importing devices and products in the United States covered by one or more claims of the '719 Patent.

16. Upon information and belief, Power Integrations has been and is now inducing infringement and contributing to the infringement of the '719 Patent, both literally and under the doctrine of equivalents, by inducing or contributing to the making, using, selling, offering for sale, and importing by others devices and products in the United States covered by one or more claims of the '719 Patent.

17. Power Integrations' infringement has caused irreparable injury to Fairchild and Intersil and will continue to cause irreparable injury until Power Integrations is enjoined from further infringement by the Court.

PRAYER FOR RELIEF

WHEREFORE, FAIRCHILD and INTERSIL pray for the following relief:

- A. Judgment by the Court that Power Integrations directly infringes the '719 Patent;
- B. Judgment by the Court that Power Integrations induces or contributes to others' infringement of the '719 Patent;
- C. Preliminary and permanent injunctive relief pursuant to 35 U.S.C. § 283 enjoining Power Integrations, its officers, agents, servants, employees, successors, assigns and all other persons or entities acting in concert or participation with Power Integrations or on Power Integrations' behalf from further infringement of the '719 Patent;

D. Money damages sustained as a result of Power Integrations' infringement of the '719 Patent;

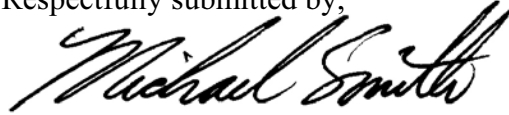
E. Costs and reasonable attorneys' fees incurred in connection with this action pursuant to 35 U.S.C. § 285; and,

F. Such other relief as the Court finds just and proper.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Fairchild Semiconductor Corporation and Intersil Corporation hereby demand a trial by jury on this action.

Respectfully submitted by,



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Attorneys for Plaintiffs,
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) this 19th day of May, 2006. Any other counsel of record will be served by facsimile transmission and/or first class mail.



Michael C. Smith